

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN RE**

EVELIO DROZ RAMOS  
AUREA ESTHER FRANCO DE DIAZ

Debtors

EVELIO DROZ RAMOS  
AUREA ESTHER FRANCO DE DIAZ  
Plaintiffs

v.

PR ASSET PORTFOLIO 2013-1  
INTERNATIONAL, LLC

JOSE R. CARRION MORALES  
CHAPTER 13 TRUSTEE  
Defendants

Case No.: 14-08190-ESL13

Chapter: ESL-13

Case No.: 16-00152

Adversary Proceeding  
Complaint to Determine Validity of  
Lien

**MOTION IN COMPLIANCE WITH ORDER**

To the Honorable Court:

Secured creditor and defendant PR Asset Portfolio 2013-1 International LLC<sup>1</sup>, by counsel, respectfully states and prays:

1. On December 2, 2016, this Honorable Court ordered the parties to file a report, every ninety days (90) thereafter (Docket #29), regarding the status of the related state court litigation, Civil Case No. DCD 2009-0494 (504), before the PR Court of First Instance, Bayamón Superior Court (the “Litigation”).

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<sup>1</sup> (Hereinafter, “PRAPI”)

2. On June 12, 2018, this Honorable Court entered an order granting PRAPI an extension of time until today, June 25, 2018 to file its follow up motion in compliance with Court's order. (Docket #58)

3. In compliance with the Court's order in Docket #29, PRAPI supplements its prior motions in compliance with Court order, to inform as follows:

- a) March 15, 2018 - PRAPI filed a *Motion to Inform and Clarify the Correct Name of the Plaintiff in the Case Heading*.
- b) April 2, 2018 - after PRAPI's motion of March 15, 2018 was granted by the Court, Defendants filed a motion titled: *Motion in Opposition to Correction; in Reconsideration and Requesting Remedies*, which PRAPI asserts is part of Debtors' continued delay tactics.
- c) April 16, 2018 – PRAPI was forced to file a *Motion to Inform Defendants' Non-Compliance with March 27, 2018 Order and Requesting Remedies*.
- d) April 18, 2018 – PRAPI was forced to file a *Motion to Inform Intent to Respond to Defendants' Motion*.
- e) April 27, 2018 – Defendants filed their *Motion in Compliance with Order*.
- f) May 3, 2018 – PRAPI was forced to file an *Urgent Motion to Inform and Requesting Order*; informing that defendants still had not notified their August 17, 2017 motion.
- g) May 4, 2018 – PRAPI was forced to file an *Urgent Motion Requesting an Additional Extension to Respond to Defendant's Motion*
- h) May 10, 2018 - Defendants filed a *Motion in Compliance of Order*. Defendants finally notified their August 17, 2017 motion, rehashing their arguments to attempt

cancel the mortgage, which is duly registered in the Registry of Property.

i) May 22, 2018 - PRAPI filed an *Urgent Motion to Inform and Requesting an Additional Extension in Order to Present a Joint Response to Defendant's Motions*.

For the purpose of judicial economy, PRAPI expects to, very shortly, file a joint opposition to both Defendants August 17, 2017 motion -which was very recently notified by Defendants to PRAPI- as well as to Defendants April 2, 2018 motion.

**WHEREFORE**, PRAPI respectfully requests that this Honorable Court take notice of the above stated for all pertinent purposes and, more specifically, of PRAPI's continued compliance with the Court's order in Docket #29.

Respectfully submitted.

**I HEREBY CERTIFY** that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the parties appearing in said system and that notice has been sent by mail to the interested parties not appearing in said system.

**RESPECTFULLY SUBMITTED**, in Guaynabo, Puerto Rico, this 25<sup>th</sup> day of June, 2018.

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